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of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STATEMENT OF THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS IN SUPPORT OF THE  
DEBTORS' MUTUAL ASSISTANCE  
MOTION**

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Date: July 9, 2019  
Time: 9:30 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
450 Golden Gate Avenue  
San Francisco, CA 94102

Re: Docket No. 2588

1 The Official Committee of Unsecured Creditors (the “Creditors’ Committee”) of PG&E  
2 Corp. and Pacific Gas and Electric Company (collectively, the “Debtors”) hereby submits this  
3 Statement in Support of the Debtors’ *Omnibus Motion Pursuant to 11 U.S.C. § 365(a), Fed. R.*  
4 *Bankr. P. 6006, and B.L.R. 6006-1 to Approve the Utility’s Assumption of Mutual Assistance*  
5 *Agreements* (the “Mutual Assistance Motion”) [Docket No. 2588].<sup>1</sup>

### 7 STATEMENT

8 1. The Creditors’ Committee believes that the prospect of a successful reorganization  
9 in these cases rests firmly on the Debtors’ ability to demonstrate that they can provide power to  
10 their customers in a safe, reliable, responsible and sustainable manner. The Creditors’ Committee  
11 has been, and will continue to be, focused on making sure the Debtors are giving those issues the  
12 highest priority.

13 2. The Mutual Assistance Motion recognizes that the Debtors’ efforts in this regard  
14 will depend not only on their own safety and mitigation practices, programs and policies, but also  
15 on their ability to obtain assistance from outside sources when necessary. Pursuant to the Mutual  
16 Assistance Motion, the Debtors seek to secure the continued cooperation and assistance from  
17 neighboring utilities (members of the so-called “mutual assistance network”) as and when needed  
18 to help them promptly respond to future emergency situations.

19 3. The Creditors’ Committee believes that obtaining this cooperation and assistance  
20 through the Debtors’ ongoing participation in the mutual assistance network is an important  
21 component of the Debtors’ overall safety program and therefore supports approval of the Mutual  
22 Assistance Motion.  
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28 <sup>1</sup> Capitalized terms not defined herein have the meanings ascribed to them in the Mutual Assistance Motion.

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Dated: July 2, 2019

**MILBANK LLP**

/s/ Gregory A. Bray  
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SAMUEL A. KHALIL  
GREGORY A. BRAY  
THOMAS R. KRELLER

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